

ORIGINAL

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING

MAR - 9 2006

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Stephan Harris, Clerk  
Casper

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

<b>UNITED STATES OF AMERICA</b>	)	Criminal No. <u>05CR215-D</u>
	)	
Plaintiff,	)	
	)	
v.	)	<b><u>STATEMENT OF ELEMENTS</u></b>
	)	
<b>MARTIN WILLIAM CHAMBERS,</b>	)	
	)	
	)	
Defendant.	)	

In order to prove a violation of 18 U.S.C. §§ 922(j) and 924(a)(2)(Possession of a Stolen Firearm), as set forth in Count 2 of the Indictment, the United States must prove beyond a reasonable doubt each of the following elements:

1. On or about April 15, 2005;
2. in the District of Wyoming;
3. the Defendant, **MARTIN WILLIAM CHAMBERS**;

4. knowingly possessed a stolen firearm, that is, a Model 92F, Peitro Beretta, Bardone V.T., USA Corp., semi-automatic pistol, serial number D94066Z;
5. which had been shipped or transported in interstate or foreign commerce, either before or after it was stolen; and
6. the Defendant knew and had reasonable cause to believe the firearm was stolen.

In order to prove a violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), (Felon in Possession of a Firearm), as set forth in Count 3 of the Indictment, the United States must prove beyond a reasonable doubt each of the following elements:


1. On or about April 15, 2005;
2. in the District of Wyoming;
3. the Defendant, **MARTIN WILLIAM CHAMBERS**;
4. having been previously convicted of a crime punishable by imprisonment for a term exceeding one year;
5. knowingly possessed a firearm, that is, a Model 92F, Peitro Beretta, Bardone V.T., USA Corp., semi-automatic pistol, serial number D94066Z; and
6. which had previously traveled in and affected interstate commerce.

DATED this 9<sup>th</sup> day of March, 2006.

Respectfully submitted,

MATTHEW H. MEAD  
United States Attorney

By:

  
KERRY J. JACOBSON  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

This is to certify that on this 9 day of March, 2006, I served a true and correct copy of the foregoing **STATEMENT OF ELEMENTS** by hand delivery upon:

ROBERT R. ROGERS  
Assistant Federal Public Defender  
320 West 25<sup>th</sup> Street  
Cheyenne, WY 82003  
Attorney for Martin William Chambers

